

EXHIBIT I

COMMUNITY HEALTH AND SAFETY PLAN

**COMMUNITY HEALTH AND SAFETY PLAN
FOR
CLOSURE CONSTRUCTION
AT
SESI PROPERTY
OTAY MESA
SAN DIEGO COUNTY, CALIFORNIA**

PREPARED FOR:

**Coordinating Committee
United States District Court
940 Front Street
San Diego, California 92189**

PREPARED BY:

**ENV America Incorporated
16 Technology Drive, Suite 154
Irvine, California 92618
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**ENV America Project No. MCU-01 T001
October 26, 2001**

**S. "Sean" Shahin, P.E.
Principal**

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1.0 INTRODUCTION

This Community Health and Safety Plan (CHSP) was prepared by ENV America Incorporated (ENV America) for planned remedial activities at the Sesi Site (Site), located at 1902 Cactus Road, in San Diego, California. The following presents background information for the remediation activities planned for the Sesi Site and provides emergency contact information.

1.1 Background

The Coordinating Committee, United States District Court has retained ENV America as Remediation Contractor to perform environmental services at the Sesi Site located on Cactus Road, San Diego, California (Figure I-1 – Site Location Map). The Site is situated approximately 15 miles southeast of downtown San Diego, and about 1.25 miles north of the United States-Mexico International Border. The Otay Mesa is sparsely developed. The Site is located at the head of Spring Canyon, a tributary of the Tijuana River.

The Sesi property was the site of a former landfill, accepting waste between about 1968 to 1977. Accepted waste primarily consisted of material from the processing and shredding of automobiles (auto-shredder waste). The auto-shredder waste was placed in Spring Canyon, and intermittently covered with soil. Between June and July 1987, burn dump ash waste was also placed at the Site. The ash reportedly originated from the former Rancho Carrillo Municipal Landfill in Coronado, California.

The remediation of the Site will include installation of a clay/vegetative cap over the landfill area. The cap will practically contain the waste material at the Site and substantially reduce infiltration of surface water into the landfill.

Information presented in this CHSP is intended to help minimize the potential for offsite releases, accidents, and physical hazards to the public. The procedures in this CHSP were developed based on current knowledge of the specific chemical and physical hazards that are known or expected to be encountered during remediation activities at the Sesi Site. This CHSP was written to comply with the County of San Diego, Department of Environmental Health, Site Assessment and Mitigation Division (SAM) manual guidelines.



Exhibit I-1

DRAFT RAW
October 26, 2001

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1.2 Emergency Information

In the event of an accident or emergency situation, immediate action must be taken by the first person recognizing the event. A Site location map showing the route from the Site to the nearest hospital is presented in Figure I-2 – Route to Hospital (Exhibit I-A). The appropriate telephone numbers for emergency assistance are listed below:

Emergency Telephone Numbers and Hospital Information:

Local Police: 911

Fire: 911

Ambulance: 911

Nearest Hospital: Scripps Memorial Hospital
425 H. Street
Chula Vista, California
(619) 691-7000

Directions: Take Cactus Road North to Otay Mesa Road. Turn left (west) onto Otay Mesa Road and proceed 1.8 miles to the 805 Freeway. Go north 4.6 miles on the 805 Freeway and exit onto H Street. Turn right (east) on H Street and proceed about 0.1-mile to the hospital.

EMERGENCY ENVIRONMENTAL NOTIFICATION

Telephone

ENV America Project Manager:	Office () To be Assigned
	Cell () To be Assigned
ENV America Site Foreman:	Cell () To be Assigned
Coordinating Committee Contact Person:	Office () To be Assigned
County Regulatory Agency:	
(Hazardous Materials Management)	(619) 338-2222
Air Pollution Control District	(858) 650-4550
U.S. EPA (24-hour Hotline)	(800) 424-9346
National Response Center	(800) 424-8802

2.0 SITE IDENTIFICATION AND CONDITIONS

Site-specific identification information is provided below:

Site Address: Sesi Property
 1902 Cactus Road, Otay Mesa
 City of San Diego, California

APN: 646-100-49, 646-100-59 and 649-100-70

DEH Case Number: H 32105/VX0718

Property Owners' Mr. Salim D. Sesi
Representative: 1415 Coker Way
 El Cajon, California 92021
 (619-588-7882)

Contact: Mr. Salim D. Sesi

Court: The Honorable Anthony J. Battaglia, U.S. Magistrate Judge
 United States District Court, Southern District of California
 940 Front Street
 San Diego, California 92189
 (619-557-3446)

Coordinating	Richard G. Oppen, Esq.	Ms. Sandra Sciutto
Committee:	Partner	CFO & Sr. V.P.
	Foley & Lardner	Signal Landmark
	402 West Broadway, 23 rd Floor	6 Executive Circle, #250
	San Diego, California 92101-3542	Irvine, California 92614
	(619-234-6655)	(949) 250-7700

Consultant: S. "Sean" Shahin
ENV America Incorporated
16 Technology Drive, Suite 154
Irvine, California 92618
(949) 453-9191

Figure I-3 - Site Plan (Exhibit I-A) shows the remediation zones and surrounding facilities. Access to the Site from Cactus Road is controlled by a fence and locked gate.

3.0 SITE ACTIVITIES

A complete description of proposed activities for the Site is included in the Removal Action Workplan (RAW), dated October 26, 2001. The remediation scope of work will include the following activities:

- Relocation of waste from excavations to identified onsite disposal areas within the landfill boundary.
- Installation of a minimum 2-feet thick foundation layer over an area of approximately 4.5 acres.
- Installation of a minimum 12-inch thick low permeability clay layer, over the foundation layer.
- Installation of a minimum 1.5-feet thick vegetation layer over the clay layer.
- Construction of a buttress at the toe of the landfill.
- Construction of a surface water management system, including channels, liners, riprap, pipes, sitting basin, and gabions.
- Dewatering of the landfill and water management during construction.

Approximately 16 to 20 work weeks will be required to complete the Site remediation.

4.0 EVALUATION OF POTENTIAL PUBLIC EXPOSURE TO HAZARDS

Potential hazards associated with the planned remediation activities at the Site includes the following:

- Dust generated by the movement of heavy machinery and stockpiling activities;
- Noise levels at the Site perimeter in excess of 85 decibels;
- Vapors and odors emanating during waste handling as part of excavation activities;
- Odor and vapor emanating from open excavations; and
- Operation of heavy machinery and truck traffic.

These potential nuisances and hazards are typical of excavation operations and can be easily controlled, as described in Section 5. The design has been implemented to minimize the excavation and relocation of waste. However, the Site presents particular concerns to onsite workers as they will be working with heavy machinery. Public exposure to these hazards will be minimized by controlling access to the work zones.

5.0 CONTROL MEASURES

The following section describes the control measures that will be used to protect the surrounding community from potential hazards associated with remediation activities

5.1 Physical Hazards

Potential nuisances and hazards associated with remediation activities at the Site, includes fugitive dust, noise, odors, open excavations, waste handling, soil stockpiles, and traffic.

5.1.1 Site Security

Public access to the Site will be restricted by the in-place fencing. The public will be strictly excluded from the Site. Gates will be monitored to prevent unauthorized access during trucking operations. All work areas and all excavation exclusion zones will be demarcated by "caution" tape and barricades.

5.1.2 Vapors

The primary contaminants being reworked are soil and solid waste, both of which have low volatility, and should not present an explosion hazard. However, field instrumentation will be used to monitor air quality. Vapor concentrations will be monitored hourly at a minimum during excavation activities. The periodic vapor measurements will be obtained in and around the working area. Vapor monitoring will be conducted at the Site downwind perimeter if vapor measurements in the excavation exceed 10 parts per million (ppm). Monitoring instrumentation will include a photoionization detector (PID) or a flame ionization detector (FID). Where appropriate, a combustible gas indicator (CGI) will be utilized to monitor oxygen levels and potentially explosive gases.

Field action levels and protocols implemented to mitigate community exposure to vapors are described below:

a. Toxic Vapors

If PID or FID readings exceed 10 ppm at the Site perimeter for more than five (5) consecutive minutes, engineering controls such as the use of water spray with vapor suppressants will be applied immediately. If conditions persist, the area will be covered with plastic sheeting or clean soil. If vapors do not dissipate and continue to be detected at readings exceeding 10 ppm at the Site perimeter, the Site health and safety manager will be contacted.

b. Explosive Vapors

If CGI readings in the excavation exceed 5 percent of the lower explosive limit (LEL), mitigation measures must be implemented. Vapor will be controlled with water spray and vapor suppressants. Work will cease and personnel will be evacuated if readings of 10 percent of the LEL are exceeded.

If LEL readings exceed 5 percent of the LEL at the Site perimeter, work will cease and mitigation measures will be taken. Stockpiles will be covered and the excavation area will be sprayed with vapor suppressants or covered with plastic or clean soil. If readings exceed 20 percent of the LEL, the fire department will be contacted. Response procedures, including personnel evacuation, will be coordinated with the fire department.

Personnel encountering atmospheres that contain oxygen levels in excess of 23% must evacuate the Site immediately and must notify the fire department. If oxygen levels drop below 19.5%, affected personnel will be promptly evacuated.

No smoking will be allowed in the exclusion work zone at any time.

5.1.3 Dust

Dust will be controlled with water during all phases of work, including excavation, loading, backfilling, and compacting. All excavated waste will be relocated into identified onsite disposal areas and covered by compacted clean soil at the end of each work day. Loose soil will be watered and compacted regularly.

5.1.4 Noise

A noise level meter will be used to monitor noise at the perimeter of the Site. If monitoring indicates that noise levels exceed general construction industry standards at locations adjacent to nearby residences, work activities will be modified to reduce noise levels.

5.1.5 Odors

Vapors emanating from excavations in waste and onsite relocation areas for waste may be accompanied by odors. Vapor controls such as water spray with vapor suppressants or compacted clean soil will be used if necessary. Exposed waste in excavations or in disposal areas will be covered by compacted clean soil at the end of each day.

5.1.6 Open Excavation

The excavations at the Site will remain open no longer than necessary to complete the remedial work. Persons not associated with the remediation activities will be strictly excluded from the work zone. Workers at the Site will be protected from the open excavations by the use of barricades and caution tape at the excavation perimeters. The exclusion zone perimeters will be maintained at least 10 feet from the edge of each excavation to reduce hazards associated with potential excavation cave-ins.

5.1.7 Stockpiled Soil

Clean, imported soil stockpiled onsite for use as fill material will be covered if needed to prevent wind or water erosion. Soil stockpiles remaining onsite will be positioned such that any stockpile runoff will be contained onsite, or will be bermed to prevent rainwater runoff or erosion.

5.1.8 Stored Groundwater

None of the excavations should encounter groundwater, except during construction of the toe buttress. The water will be pumped into a temporary tank and will be used as dust and odor control in open excavations in the waste.

5.1.9 Traffic

All remediation activities will be conducted within the controlled Site perimeter fencing at the Site. Traffic controls will not be required inside the Site facility. Truck traffic leaving and entering the Site will be monitored and controlled in accordance with the traffic control plan approved by the City of San Diego to ensure safe operations. Approximately 40 to 80 truck-trips per day will occur during soil import operations.

5.2 Chemical Hazards

The primary contaminants of concern at the Site are solid wastes including burn dump ash and auto-shredder waste. These wastes have relatively low toxicity and do not contain significant concentrations of carcinogenic chemicals. The design of the engineered cap has minimized the excavation into the existing material. As discussed above, waste or ash exposed during excavation and relocation activities will be monitored for vapor emissions and covered at the end of each day by compacted clean soil.

6.0 SITE SAFETY MANAGER

ENV America's Site Foreman will be designated as the onsite health and safety manager. The Site Foreman will be onsite during construction activities. Emergency contact telephone numbers are listed in Section 1.2.

7.0 EMERGENCY PLANNING

The potential risk of Site remediation activities resulting in an emergency due to release of hazardous waste is remote. Potential nuisance problems are fugitive dust emissions, vapors, and odors. In the event of an emergency situation, work will cease immediately and the appropriate personnel listed in Section 1.2 will be notified immediately. Monitoring activities and control measures for dust, vapor, and odor problems are discussed in Section 5.0.

As in any grading project, potential risks to the community can occur due to a fire. Prior to construction the local fire department will be contacted to arrange a meeting at the Site to inform them of the planned activities.

8.0 PUBLIC NOTIFICATION

A copy of the community right-to-know notification is included in Exhibit B. Copies of this notification will be distributed to adjacent residents and businesses prior to commencing remediation activities. The notification will also be posted around the perimeter of the Site during remediation activities.

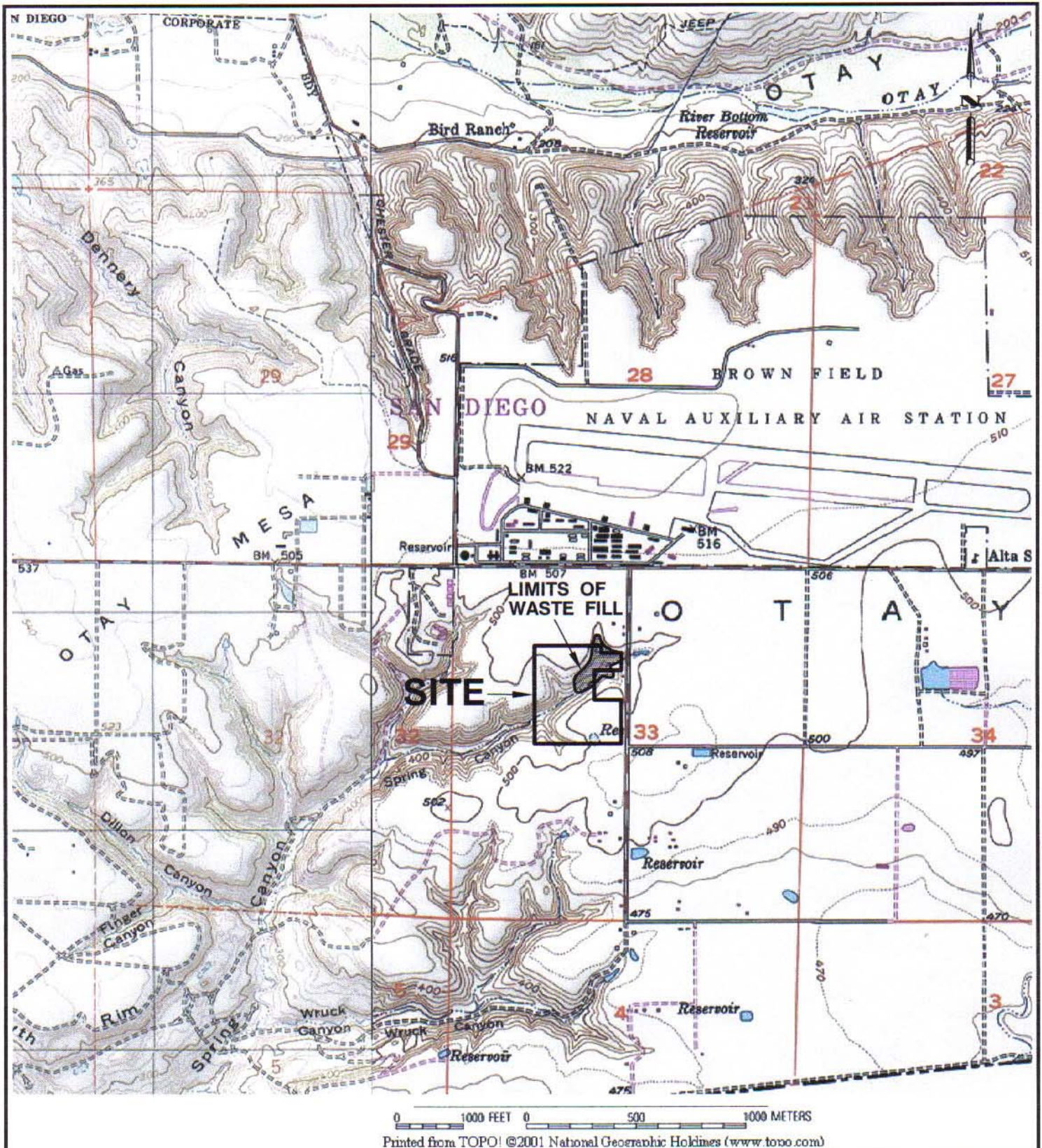
EXHIBIT I-A

FIGURES

Figure I-1 – Site Location Map

Figure I-2 – Route to Hospital

Figure I-3 – Site Plan



REFERENCE:

7.5 MINUTE U.S.G.S. TOPOGRAPHIC MAPS OF:
 - IMPERIAL BEACH, CALIFORNIA - BAJA CALIFORNIA NORTE, DATED 1967, PHOTOREVISED 1975.
 - OTAY MESA, CALIFORNIA, DATED 1955, PHOTOREVISED 1971, PHOTO INSPECTED, 1975.
 ORIGINAL SCALE ON BOTH MAPS: 1 INCH = 2,000 FEET.

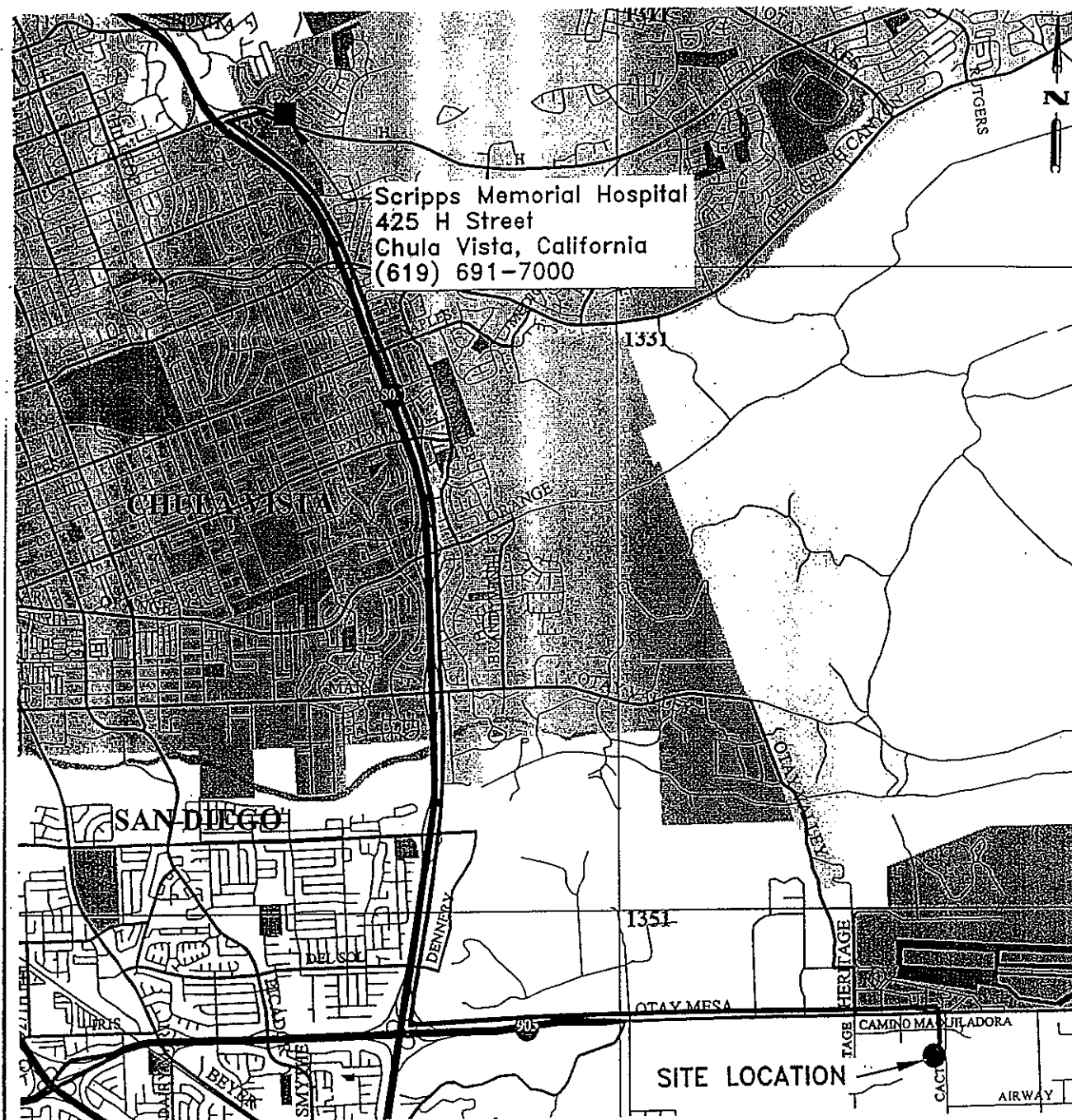


FIGURE I-1

SITE LOCATION MAP

SESI PROPERTY CLOSURE PROJECT
 OTAY MESA, SAN DIEGO

DRAWN	DP	CHECKED BY	FILE NAME	LOCMAP I-1
By	11/11/98	APPROVED BY	PROJECT NUMBER	MCU01T001.210



NOT TO SCALE

FIGURE 1-2

ROUTE TO HOSPITAL

**SESI PROPERTY CLOSURE PROJECT
OTAY MESA, SAN DIEGO**

REFERENCE:

"THOMAS BROS. MAPS", 1996, GEOFINDER FOR WINDOWS

ENV
AMERICA
ENVIRONMENTAL ENGINEERING,
CONSULTING & CONSTRUCTION

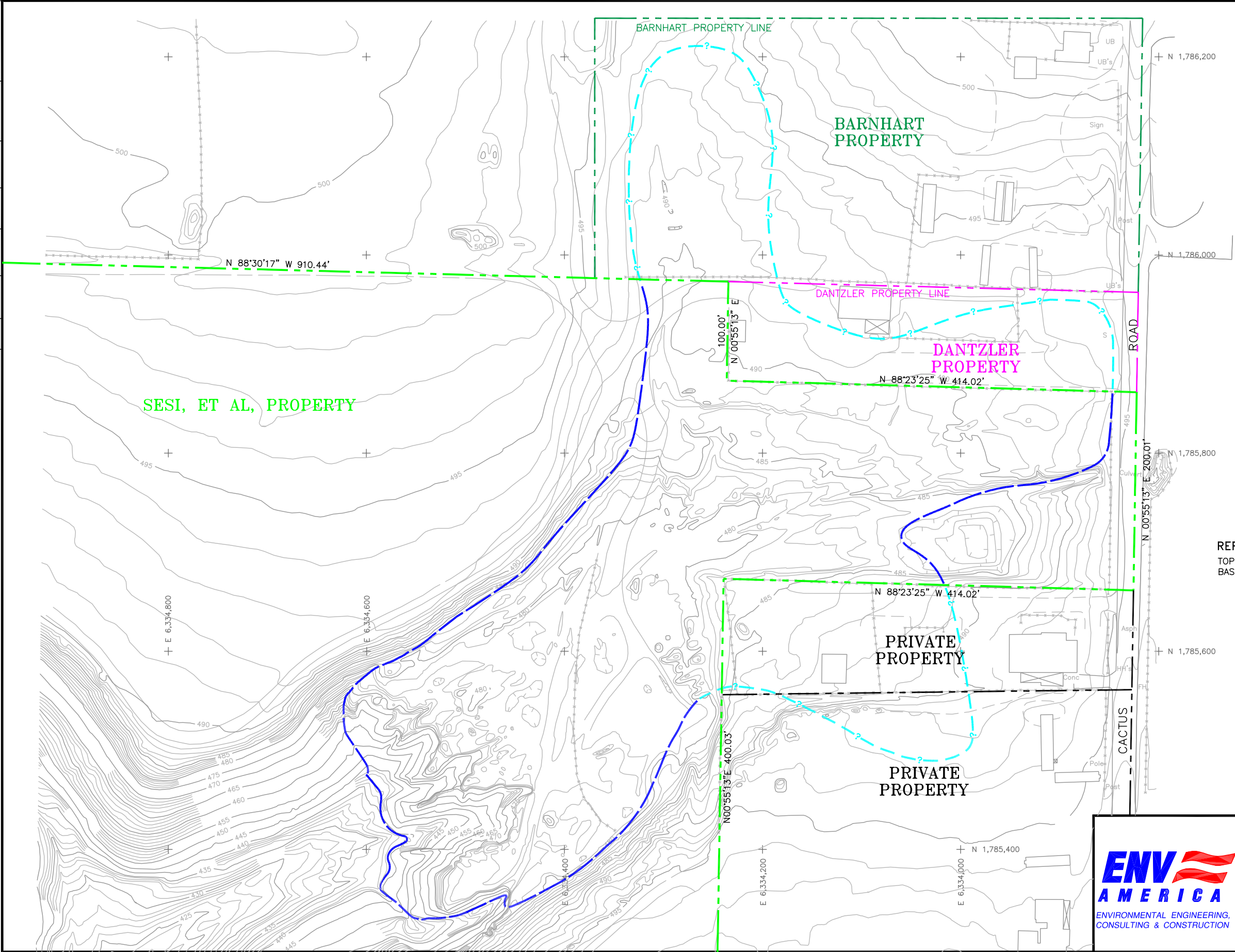


FIGURE I-3

SITE PLAN

SESI PROPERTY CLOSURE PROJECT
OTAY MESA, SAN DIEGO

EXHIBIT I-B

COMMUNITY NOTIFICATION

COMMUNITY NOTIFICATION

THE FENCED AREAS AT THIS SITE WILL BE CLOSED TO THE PUBLIC

ENV America Incorporated (ENV America) will be involved in Site remediation activities conducted at the Sesi Site located at 1902 Cactus Road, San Diego, California. Remediation activities will commence in _____ and continue through _____. **Onsite work will be conducted between the hours of 7 a.m. and 5:30 p.m.** Remediation activities will include excavating soil that possibly contain chemical compounds included on the Proposition 65 list of chemicals. (Title 22 California Code of Regulations, Section 12000).

WARNING: This area contains chemical known to the State of California to cause cancer. (Title 22 California Code of Regulations, '1200 et seq.).

ENV America will conduct perimeter monitoring during excavation activities. Every precaution will be taken to minimize the release of vapors and dust to the atmosphere.

If excess odors, noise, or dust, or other safety concerns are noted at the Site, please call:

ENV America
(949) 453-9191 (office)
or
(949) _____ (cell)

San Diego County Site
Assessment & Mitigation
Division (SAMD)
(619) 338-2222

ENV America appreciates your cooperation in this matter and apologizes for any inconvenience this may have in your operations. A copy of the community health and safety plan for remediation activities is available at _____, San Diego, California 92101



Exhibit I-B-1